

9  
7/19/01  
JL

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

EDWARD R. COSS, JR., : CIVIL ACTION NO. 01-878  
PETITIONER, : JUDGE CALDWELL/  
Vs. : MAGISTRATE JUDGE BLEWITT  
:  
JAMES MORGAN, et al., :  
RESPONDENTS. :  
:

FILED  
HARRISBURG, PA

JUL 16 2001

RESPONSE TO RESPONDENT'S APPLICATION FOR RELIEF  
(Request for Extension of Time)

MARY E. D'ANDREA, CLERK  
Per *[Signature]*  
Deputy Clerk

AND NOW COMES the Petitioner, Edward R. Coss, Jr., via Pro Se, who avers the following forthwith:

1. Admitted. By way of further answer the court specifically ordered the "Respondent's" to file an answer and not "Response."
2. Admitted in part and denied in part. It is admitted that Respondent's counsel had taken a 15 day pre-paid vacation at the taxpayers expense, but, it is denied that the Respondent's were unable to file and complete an answer in a timely manner.

By way of further answer, if counsel known he would take a pre-paid vacation at the taxpayers expense than this present application for relief could have been filed way before July 5, 2001, hence, the vacation was a pre-paid one.

WHEREFORE, the Petitioner requests that the Respondent's if granted leave of court for an extension to file an answer is granted, 15 days, rather, than 30 days is a more appropriate form of relief.

I, Edward R. Coss, Jr., do hereby verify the within is true and correct under the penalty of perjury.

Respectfully submitted,

Edward R. Coss Jr.  
Edward R. Coss, Jr., CB#5970  
SCI Smithfield  
P.O. Box 999, 1120 Pike Street  
Huntingdon, Pennsylvania 16652

Executed this 12<sup>th</sup> day of July, 2001